

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

**NASHVILLE, TENNESSEE**

**IN RE:**

**GENERIC DOCKET ADDRESSING  
RURAL UNIVERSAL SERVICE**

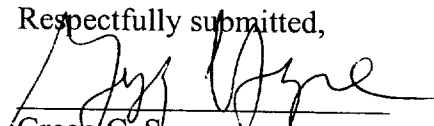
**Docket No. 00-00523**

**COMMENTS OF THE CITIZENS COMPANIES**

Citizens Telecommunications Company of Tennessee, LLC and Citizens Telecommunications Company of the Volunteer State, LLC (the "Citizens Companies"), by their attorney, hereby support the September 4, 2001 proposal of the Coalition of Small LECs and Cooperatives to consider a number of issues and their impact on Universal Service in the rural areas of Tennessee. If the impact of changes in intercarrier compensation and Universal Service funding on small LECs and rural areas is not specifically considered, it is possible that rural customers may be forced to bear unreasonable and unaffordable local rate increases. It is also possible that rural customers will not receive the benefits of advanced services if the necessary infrastructure investments are rendered uneconomic by regulatory actions.

The Citizens Companies support either a separate docket or the expansion of Docket No. 00-00523 to consider these matters, and also support the Coalition's proposal for a workshop format.

Respectfully submitted,



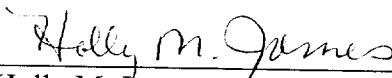
Gregg C. Sayre  
Associate General Counsel  
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DATE: October 16, 2001

## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was served via first class United States mail, this 19<sup>th</sup> day of October, 2001 on:

Stephen G. Kraskin, Esq.  
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Washington, DC 20037

  
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Holly M. James